

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission On Its Own Motion)	
)	
Investigation Concerning Illinois Bell Telephone)	Docket No. 01-0662
Company's compliance with Section 271 of the)	
Telecommunications Act of 1996)	

**AMERITECH ILLINOIS' OPPOSITION TO JOINT CLEC
MOTION TO EXTEND DATE FOR FILING REPLY BRIEFS**

Illinois Bell Telephone Company ("Ameritech Illinois" or the "Company"), by its attorneys, hereby files this Opposition to the Joint CLEC Motion to Extend the Date for the Filing of the Reply Briefs in this matter.

1. This docket is examining Ameritech Illinois' compliance with the requirements of Section 271, a prerequisite for Ameritech Illinois' entry into the interLATA business. The ability of Ameritech Illinois to get into the interLATA business has always been important, but it is increasingly vital both to Ameritech Illinois' ability to match "full service" competitive offers in the marketplace and to Illinois consumers who have observed increasing instability in the telecommunications marketplace.

2. On October 24, 2001, the Commission initiated this proceeding.

3. On November 27, 2001, the Administrative Law Judge established a procedural schedule which set the dates for testimony, hearings and briefing. Under this schedule, reply briefs were due July 2, 2002.

4. On March 5, 2002, the Administrative Law Judge granted Staff's motion to amend the schedule. The Order moved back the dates for testimony and hearings and established July 26, 2002 as the new due date for reply briefs.

5. On June 6, 2002, the briefing schedule was amended so that initial briefs were due on July 19, 2002 and reply briefs were due on August 16, 2002.

6. Hearings were conducted between June 17, 2002 and June 21, 2002 and all cross examination was completed by June 21, 2002. There was an additional hearing date on July 1, 2002, but there were no live witnesses presented on July 1st – the hearing was limited to the admission of pre-filed testimony and affidavits.

7. At some point during the hearing, the Administrative Law Judge granted a request by the CLECs to further extend the briefing schedule so that the initial briefs were due on July 24, 2002 and reply briefs were due on August 21, 2002. On July 16, 2002, the Administrative Law Judge issued a notice stating that the new due date for reply briefs was August 21, 2002.

8. Initial briefs were filed on July 24, 2002 – a little more than 30 days after the conclusion of the cross examination in this hearing. Under the initial schedule, the parties were to have had six weeks after the completion of the hearings to file both initial briefs and reply briefs. Under the schedule as it has been revised from time to time, the parties had more than four weeks from the completion of cross examination to file initial briefs and will have an additional four weeks to file their reply briefs.

9. It is not the case that there is additional time available to build into the briefing schedule. The briefing of Phase I must be completed as quickly as possible because there is so much more to be done in this docket; e.g., the Administrative Law Judge must issue the proposed order, briefs on exception and reply briefs on exception will be filed, and the Commission must issue its Phase I Order. Should the Commission find any deficiencies in the application, Ameritech Illinois would, of course, need time to address those items.

WHEREFORE, for all of the above-stated reasons, Ameritech Illinois respectfully requests that the Joint CLEC Motion to Extend the Date for Filing of Reply Briefs in this matter be denied. Ameritech Illinois does not believe that an emergency status hearing is required to resolve this issue, but has no objection to such a hearing if the Administrative Law Judge believes that it would facilitate resolution of this matter.

Respectfully submitted,

ILLINOIS BELL TELEPHONE COMPANY

One of Its Attorneys

Louise A. Sunderland
Mark R. Ortlieb
Illinois Bell Telephone Company
225 West Randolph, Floor 25D
Chicago, Illinois 60606
(312) 727-6705
(312) 727-2415

CERTIFICATE OF SERVICE

I, Mark R. Ortlieb, an attorney, certify that a copy of the foregoing **AMERITECH ILLINOIS' OPPOSITION TO JOINT CLEC MOTION TO EXTEND DATE FOR FILING REPLY BRIEFS** was served on the following parties by electronic transmission on August 12, 2002.

Mark R. Ortlieb

SERVICE LIST FOR DOCKET 01-0662

Eve Moran
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago, IL 60606
emoran@icc.state.il.us

Mary C. Albert
Allegiance Telecom of Illinois, Inc.
1919 M Street NW
Suite 420
Washington, DC 20036
mary.albert@algx.com

Penny Bewick
New Edge Networks, Inc.
3000 Columbia House Blvd.
Vancouver, WA 98668
pbewick@newedgenetworks.com

Sean Brady
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago, IL 60606
sbrady@icc.state.il.us

Allan Goldenberg, Cecely Castillo,
Mark N. Pera, Marie Spicuzza
Cook Co. State's Attorney's Office
69 West Washington, Suite 700
Chicago, IL 60602
agolden@cookcountygov.com
ccastil@cookcountygov.com
mpera@cookcountygov.com
saopib@wwa.com

Robin F. Cohn, Michael P.
Donahue, Eric J. Branfman
Swidler Berlin Shereff Friedman
3000 K Street NW, Suite 300
Washington, DC 20007
rfohn@swidlaw.com
mpdonahue@swidlaw.com
ejbranfman@swidlaw.com

Tamara E. Connor
Kelley Drye & Warren LLP
8000 Towers Crescent, Suite 1200
Vienna VA 22182
tconnor@kelleydrye.com

Susan L. Satter, Janice A. Dale
Illinois Attorney General's Office
100 West Randolph St., 11th Floor
Chicago, IL 60601
ssatter@atg.state.il.us
jdale@atg.state.il.us

Matt C. Deering, Dennis K.
Muncy, Joseph D. Murphy
Meyer Capel
306 West Church Street
PO Box 6750
Champaign IL 61826
mdeering@meyercapel.com
dmuncy@meyercapel.com
jmurphy@meyercapel.com

J. Tyson Covey, Kara Gibney,
Theodore A. Livingston, Demetrios
G. Metropoulos, Angela O'Brien,
Daniel Parish, Hans J. Germann
Mayer Brown Rowe & Maw
190 South LaSalle
Chicago, IL 60603
jcovey@mayerbrownrowe.com
kgibney@mayerbrownrowe.com
tlivingston@mayerbrownrowe.com
demetro@mayerbrownrowe.com
aobrien@mayerbrownrowe.com
dparish@mayerbrownrowe.com
hgerman@mayerbrownrowe.com

Joseph E. Donovan, Henry T. Kelly
O'Keefe Ashenden Lyons & Ward
30 North LaSalle Street, Suite 4100
Chicago, IL 60602
jedonovan@oalw.com
hkelly@oalw.com

Carmen Fosco
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago, IL 60601
cfosco@icc.state.il.us

Richard E. Heatter
MGC Communications, Inc.
3301 North Buffalo Drive
Las Vegas, NV 89129
rheatter@mgccom.com

David A. Irwin, Loretta J. Garcia
Irwin Campbell & Tannenwald PC
1730 Rhode Island Avenue NW
Washington, DC 20036
dirwin@ictpc.com
lgarcia@ictpc.com

Cheryl Urbanski Hamill, John
Gomoll
AT&T Communications
222 West Adams Street, Floor 15
Chicago, IL 60606
chamill@att.com
gomolj@att.com

Chris Graves
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
cgraves@icc.state.il.us

William A. Haas
McLeodUSA
6500 C Street, SW
P. O. Box 3177
Cedar Rapids, IA 52406-3177
whaas@mcleodusa.com

Matthew L. Harvey
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago, IL 60601
mharvey@icc.state.il.us

Michael B. Hazzard
Kelley Drye & Warren LLP
8000 Towers Crescent, Suite 1200
Vienna VA 22182
mhazzard@kelleydrye.com

Peter R. Healy
TDS Metrocom, Inc.
525 Junction Road, Suite 6000
Madison, WI 53717
peter.healy@tdsmetro.com

Andrew O. Isar
Association of Communications
Enterprises
7901 Skansie Avenue, Suite 240
Gig Harbor, WA 98335
aisar@millerisar.com

Scott Kellogg
CoreComm Illinois, Inc.
70 West Hubbard Street, Suite 410
Chicago, IL 60610
scott.Kellogg@corecomm.com

Owen E. MacBride
Schiff Hardin & Waite
233 South Wacker Drive
6600 Sears Tower
Chicago, IL 60606
omacbride@schiffhardin.com

M. Gavin McCarty
Globalcom, Inc.
333 West Wacker, Suite 1500
Chicago, IL 60606
gmccarty@global-com.com

Stephen D. Minnis
Sprint Communications Company
8140 Ward Parkway, 5E
Mailstop MOKCMP0503
Kansas City, MO 64114
steve.minis@mail.sprint.com

Thomas Rowland, Stephen J.
Moore
Rowland & Moore
77 West Wacker, Suite 4600
Chicago, IL 60601
tom@telecomreg.com
stephen@telecomreg.com

Julie Musselman
Illinois Commerce Commission
527 East Capital Avenue
Springfield, IL 62701
jmusselm@icc.state.il.us

Joy Nicdao-Cuyugan
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago, IL 60601
jncuyuga@icc.state.il.us

David Nixon
Illinois Commerce Commission
160 North LaSalle, Suite C-800
Chicago, IL 60601
dnixon@icc.state.il.us

Jack A. Pace
City of Chicago
30 North LaSalle, Suite 900
Chicago, IL 60602-2580
jpace@ci.chi.il.us

Patrick Phipps
Illinois Commerce Commission
527 East Capital Avenue
Springfield, IL 62701
[pphipps@icc.state.il.us](mailto:ppphipps@icc.state.il.us)

Carol P. Pomponio
XO Illinois, Inc.
303 East Wacker
Concourse Level
Chicago, IL 60601
cpomponio@xo.com

Darrell S. Townsley
WorldCom
205 North Michigan, 11th Floor
Chicago, IL 60601
darrell.townsley@wcom.com

Ron Walters
Z-Tel Communications, Inc.
601 South Harbour Island Blvd.
Tampa, FL 33602
rwalters@z-tel.com

Michael Ward
Michael W. Ward, P.C.
1608 Barclay Blvd
Buffalo Grove, IL 60089
mwward@dnsys.com

Nancy Wells
AT&T Communications
913 South Sixth Street, Floor 3
Springfield, IL 62703
njwells@att.com

Torsten Clausen
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
tclausen@icc.state.il.us